

STOP THIS Gladman Development Action Group

Joint Core Strategy Review Issues and Options Consultation (Regulation 18) October 2018

Ridge (ridgeplanning.co.uk), on behalf of the Stop This Gladman Development Action Group, have kindly prepared these responses to the JCS Issues and Options Consultation. You can use this document to form the basis of your response. It is important that you **do not** cut and paste these answers into the online questionnaire, but modify them into your own words. If you prefer, just pick out some questions that you would like to respond to.

The closing date for responses is 17:00 on Friday 11th January 2019.

Please visit <http://consult.gct-jcs.org/consult.ti/iando/consultationHome> to respond online or by post. This webpage also has a link to the JCS Issues and Options Consultation document which is worth reading before drafting your response. The link above and this document are also available from the Library section on the STOP THIS website.

If you have any questions regarding these responses, please get involved on the stopthis.co.uk forum.

Thank you for supporting your local community. Together we can STOP THIS.

Question 1

Do you consider that a comprehensive review of the plan is the correct approach for the JCS review? If not, what do you consider are the alternative approaches?

- Comprehensive review is necessary to keep this strategic spatial plan up to date and fully compliant with the NPPF as this will offer a good protection from speculative and unsustainable forms of development in the area.

Question 2

On the basis that the plan period needs to be extended, what do you think is a reasonable timeframe for the JCS to plan for and why?

- The National Planning Policy Framework, particularly its paragraph 22, requires a minimum 15 year period from adoption. It further demands strategic policies to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
- However, large scale sites often struggle to be delivered within the 15 year plan period because of their complex demands as such, the JCS period should be extended to 2041 as a minimum.
- The NPPF2 (2018) has re-defined the definition of 'deliverable' which can have a negative effect on the individual local planning authorities' 5 year housing land supply calculations. This is because only the sites with full planning permission are considered to be deliverable. The new definition is as follows:
***“Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”*

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Question 3

What are the strategic policy areas that you consider the JCS should cover?

- Housing allocations – on a number of strategic large-scale sites, but a number of medium size sites should be considered to ensure balanced and sustainable growth and support for rural settlements
- Commercial and Employment land allocations – sufficient employment land allocations need to be made to cater for a wide range of businesses as many are relocating elsewhere due to the lack of suitable premises.
- Wider infrastructure (roads, railways and telecommunications) needs should be strategically planned to allow for their effective delivery.
- Speculative developments served by poor infrastructure should be resisted
- Strategic plan should include planning for vital community facilities such as health and education infrastructure.
- It is also essential that the strategic plan provides policies which effectively protect the natural and historic environment of the area without hindering economic growth.

Question 4

Do you consider any alterations to the existing policies in the adopted JCS are required, particularly in light of the revised NPPF

- Current plan does not allocate enough medium sized housing sites to effectively deliver housing needed in the JCS area
- Reliance on large strategic sites to be developed does not protect smaller communities from speculative development. Conversely, sustainable development in rural communities should be considered
- There are no retail development policies in the adopted JCS

Question 5

What are the duty to cooperate issues that the JCS review will need to consider?

Cooperation with other local authorities and counties needs to be effective and meaningful.

Question 6

Are the vision, key challenges and objectives identified in the JCS still relevant? Are there new key challenges the JCS review needs to consider?

- All of the strategic objectives remain relevant.
- It is, however, unclear how these visions and objectives are going to be achieved in economically uncertain times.
- JCS needs to reconsider some of its evidence base which has been completed at times of economic and political certainty. The review of the adopted document will need to consider potential impact of wider economic changes on the local population and economy.

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Question 7

Having regard to the spatial strategy and the options presented above, how do you think the JCS authorities can most sustainably deliver for our future development needs?

- No single spatial strategy option would delivery sustainable development on its own.
- Elements of each strategy need to be adopted to deliver sustainable development.
- New settlements should only be considered if they are fully assessed and tested through the Plan-led system. No new settlements or development of over 500 dwellings should be a result of a speculative planning application.
- Urban extensions are acceptable in principle where sufficient infrastructure is delivered prior to new dwellings being occupied.
- JCS should provide strong guidance to individual Local Planning Authorities on a minimum number of deliverable sites to be allocated within their individual rural dispersal strategies.
- Incentives should be provided to assist local communities to engage in the planning process through support with Neighbourhood Plans

Question 8

Are there any justifications for departing from the Government's standard housing calculation methodology?

- The standard housing calculation methodology has been found to be flawed, particularly when the latest ONS data are used for calculations.
- In the absence of other alternatives, the methodology should be a guidance only and other important considerations should be had such as affordability ratios, population growth, and predicted economic growth.

Question 9

Do you think that there any other specific forms of housing the JCS Review should seek to address?

- Some areas struggle to provide affordable properties for local households.
- **Here you can address other issues, which are relevant to your immediate community needs, ie. Self-build or adaptable houses**

Question 10

There is going to be a need for sites to be identified for employment land. What types of employment land do you think are required in the JCS area to provide for the needs of different business sectors and where would it best be located?

Not answered.

Question 11

How can the JCS best plan for the changing nature of city and town centres to ensure they remain vital and viable in the future?

- There has been no comprehensive retail policy in the JCS area.
- Changing consumer demands on high streets should be considered.

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Question 12

Having regard to development needs in the JCS area and the spatial strategy discussed, do you feel that the known development opportunities can play a role in helping to meet needs?

- The listed sites offer a good opportunity to meet housing and economic needs in the area.
- There is no further need for urban extension/new settlement in the JCS area to be considered until the listed sites are near completion.
- Smaller, more sustainable development in rural settlements should be considered to meet housing needs

Question 13

Do you have a site you would like considered for inclusion in the Local Plans? You will need to provide a completed form with information about the site including a site plan.

- The Deerhurst Parish is considering its own allocations through Neighbourhood Plan

Question 14

What do you think is an appropriate definition for a 'strategic site' in terms of for example size, location and proposed use?

The term strategic site should not be strictly defined. Instead, it should be viewed holistically within its immediate setting. A development site capable of delivering 500 dwellings will have different impact on larger settlement such as Gloucester/ Cheltenham than on smaller Parishes such as Deerhurst.

Question 15

Are there any new infrastructure needs that the JCS Review needs to consider?

- Capacity of a number of motorway junctions in the JCS area seems to have been exceeded.
- Public transport in the JCS area is generally poor and expensive
- Telecommunication infrastructure is insufficient in many rural and urban areas
- Strategic planning and implementation of non-vehicular form of transport
- National and Local cycle networks to be planned for as part of wider infrastructure provision.